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Ref: EPR ER

INITIAL/FINAL POLLUTION REPORT
Robinson Insulation Minot Plant Site
Minot, Ward County, North Dakota

I. HEADING

Date:	January 3, 2003
From:	Joyce Ackerman, On-Scene Coordinator
Agency:	EPA
Unit:	Region VIII - Emergency Response Program 999 18th Street, Suite 300 Denver Colorado 80202 (303) 312-6822
To:	Kevin Mould, EPA Headquarters
POLREP No.:	Initial/Final
Site:	Robinson Insulation Minot Plant Site

II. BACKGROUND

Site Number:	08DC
Party Conducting the Action:	EPA
Response Authority:	CERCLA
CERCLIS No:	ND0010165116
NPL Status:	No
Action Memorandum Status:	Approved - 06/07/02
Start Date (Fund-Lead):	06/17/02
Completion Date(Fund-Lead):	December 31, 2002
Administrative Order on Consent:	11/01/02
Start Date (PRP-Lead):	11/01/02
Completion Date (PRP Lead):	Anticipated early 2003

III. SITE INFORMATION

A. Incident Category

Time-Critical, Fund-Lead.

B. Site Description

1. Site description

This is one of many facilities that received vermiculite from a mine in Libby, Montana. The mine in Libby produced about 80% of the world's supply of vermiculite at one time and shipped vermiculite ore to various locations throughout the United States. The Libby vermiculite is co-mingled with amphibole

asbestos of the tremolite-actinolite-richterite-winchite solution series and, as a result, there is asbestos contamination at many of the facilities which received vermiculite ore from the Libby mine. Invoices obtained from W.R. Grace, who purchased the Libby mine in 1963, show that 14,000 tons of vermiculite were shipped to the Minot facility between 1967 and 1983.

A. Site Description

The Robinson Insulation facility received vermiculite ore in rail cars and "exfoliated" it, which means it was expanded in a furnace. The exfoliated vermiculite was sold as an insulation product, also known as "Zonolite." The property and buildings are currently owned by the Minot Park District and are not fenced.

1. Physical location

The Site is located at 826 4th Avenue NE, in Minot, North Dakota.

2. Removal Site Evaluation and Site Characteristics

The former Robinson Insulation property is approximately 2 acres in size, and has two buildings which abut one another. EPA conducted several sampling events at the Site, and determined that soils surrounding both buildings had visible vermiculite containing up to 12 percent asbestos, as did the rail siding behind the building. The interior of the buildings on the Robinson property were extremely dusty, and EPA's bulk samples of dust showed up to 3 percent concentrations of asbestos. In addition, the stucco/cement building material on the larger building contained vermiculite as an aggregate material, and samples of the stucco showed trace levels of asbestos. The stucco was crumbling in numerous places on the 50+ year old building.

The Robinson Insulation property was sold to the Minot Park District in 1993. The Park District used the buildings for storing equipment and supplies, and EPA's sampling showed that amphibole asbestos fibers had settled on some of the equipment.

The surrounding properties include buildings owned by the Minot Park District and local businesses which are used for storage, maintenance, and manufacturing activities; a private residence owned by the Minot Park District; and additional private residences about a block away from the property.

There are no fences restricting access to any of the contaminated areas. Minot Park District employees have entered the property numerous times over the past several years to retrieve equipment or perform maintenance activities such as mowing the grass around the facility. Other groups have received permission to store equipment in the buildings and have entered the contaminated property. One of these is a civic group who have started a train museum. They have collected a number of railroad antiques and have stored these items in the buildings on the property.

The Site may also be a source of exposure to children who take shortcuts to nearby city parks or who may live in nearby residences, and to police officers who park on the contaminated gravel driveway of the property to check for speeding motorists on the adjacent street.

3. Description of threat

Asbestos is of concern because chronic inhalation exposure to excessive levels of asbestos fibers suspended in air can result in lung diseases such as asbestosis, mesothelioma, and lung cancer. Subacute exposures as short as a few days have been shown to cause mesothelioma. Asbestos is a hazardous substance as defined by 40 CFR Section 302.4 of the NCP.

IV. RESPONSE INFORMATION

A. Situation

1. Removal actions - Fund Lead

- **Assessment of equipment stored inside the contaminated buildings. Equipment was decontaminated and returned to the Park District and train museum group for storage elsewhere. Where decontamination costs would exceed the value of the item, EPA provided compensation to the appropriate parties and disposed of the item. EPA and the property owners agreed that a number of items had no value and these items were disposed without compensation.**

- **Demolition of the contaminated buildings. It was technically impracticable to remove the asbestos-containing dust inside the buildings due to the dust settling into numerous crevices over the 40+ year life of the insulation manufacturing operation. In addition, the crumbling stucco material on the exterior of the larger building contained asbestos from the vermiculite aggregate building. Therefore, the buildings were demolished.**

- **Removal of the rail siding and excavation of underlying contaminated soils. The rail siding was no longer used by the railroad or any businesses, and was removed and disposed.**

- **Excavation of contaminated soil. Sampling showed that certain areas required soil excavation down to 12 inches, and other areas down to 18 inches to remove the amphibole asbestos from the Site. The excavation included a section of a gravel road and small section of paved city street adjacent to the insulation property. Approximately 6000 cubic yards of contaminated soil were removed and replaced with clean soils and backfill.**

- **Property restoration, included placement of backfill, topsoil, road grading and compaction, and landscaping.**

2. Removal actions - PRP Lead

Libby asbestos was found in soils along railroad right-of-way areas near the Robinson property. Burlington-Northern Santa Fe Railroad consented to complete the soil excavations in these areas on the Site (RV#2-PRP). An Administrative Order on Consent was issued and BNSF began work on 11/01/02. All work was completed in November, and EPA awaits a final report from BNSF.

3. State and Local Role

EPA has kept State and local agencies apprised of the sampling events and results. Neither the State nor local agencies have the resources to conduct the needed site investigations or clean-ups independently. The State and local agencies have assisted EPA in many facets of the investigation and removal, such as identifying disposal facilities and facilitating traffic control.

B. Future Plans

The Removal Action has been completed consistent with the National Contingency Plan. EPA will keep the fund-lead delivery order open for one year in case any additional revegetation is needed in 2003. BNSF's Order will be closed out once a final report is submitted to EPA and receives approval.

C. Key Issues

None at this time.

V. COST INFORMATION

Costs for the PRP-Lead Removal were the responsibility of BNSF, and total costs for the Fund-Lead Removal have not been received at this time but will be less than the budget ceiling of $1,800,000 which was established in the Action Memorandum.

VI. DISPOSITION OF WASTE

EPA disposed of asbestos contaminated materials (ACM) at the Safety Kleen disposal facility in Sawyer, North Dakota, with the prior approval of the North Dakota Department of Health and in compliance with EPA's off-site rule. Approximately 9000 tons of ACM were shipped by EPA for the fund-lead removal action.

BNSF used the Minot City landfill for disposal of ACM, in compliance with EPA's off-site rule. Final quantities have not yet been submitted to EPA, but are anticipated to be less than 1000 cubic yards of contaminated soil.